

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

CASE NO.: 6:17-bk-07637

KYSHA T. BROWN,  
Debtor(s)

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**MOTION TO EXTEND THE AUTOMATIC STAY**

Debtor, Kysha T. Brown, by and through counsel, respectfully requests that this Court extend the automatic stay pursuant to 11 U.S.C. §362(c)(3), and in support thereof states as follows:

1. Debtor filed this Chapter 13 bankruptcy petition on December 18, 2017.
2. The Debtor previously filed Bankruptcy Case No. 16-06701 ("Prior Case"), in the United States of Bankruptcy Court, Middle District of Florida Orlando Division under Chapter 13 on 10/12/16, and was subsequently dismissed on 08/24/17 for failure make timely plan payments.
3. Debtor had no other pending bankruptcy cases dismissed in the preceding one-year period.
4. Debtor did not have any prior cases dismissed in the past year for any of the following reasons:
  - a. Failure to file or amend other required documents without substantial excuse;
  - b. Failure to provide adequate protection as ordered by the Court; or
  - c. Failure to perform the terms of a plan confirmed by the Court.
5. There has been substantial change in the circumstances of the Debtor since the dismissal of the last case. The Debtor has an increase of income which will make plan payments more feasible.

WHEREFORE, the Debtor request the Court grant this Motion to Extend the Automatic Stay as to all creditors, after notice and opportunity to be heard, and for all other proper relief.

Dated: December 20, 2017

/s/Marie F. Benjamin  
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Attorney for Debtor

**PROOF OF SERVICE**

A true and correct copy of the foregoing has been sent by either electronic transmission or US Mail on December 20, 2017 to Chapter 13 Trustee; Debtors; and all creditors and interested parties as listed on attached matrix.

/s/Marie F. Benjamin  
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